

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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ERIC LAPRAIRIE, on behalf of himself and all
other employees similarly situated,

Plaintiff,

Case No.: 6:21-cv-6306

vs.

Class Action

PRESIDIO, INC., PRESIDIO HOLDINGS,
INC., PRESIDIO LLC, PRESIDIO
NETWORKED SOLUTIONS LLC, PRESIDIO
NETWORKED SOLUTIONS GROUP, LLC and
PRESIDIO TECHNOLOGY CAPITAL, LLC,

NOTICE OF MOTION

Defendants.

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PLEASE TAKE NOTICE, that, upon the annexed Memorandum of Law and upon all prior pleadings and proceedings had herein, the undersigned attorneys for Defendants PRESIDIO, INC., PRESIDIO HOLDINGS, INC., PRESIDIO LLC, PRESIDIO NETWORKED SOLUTIONS LLC, PRESIDIO NETWORKED SOLUTIONS GROUP, LLC and PRESIDIO TECHNOLOGY CAPITAL, LLC (collectively “Defendants”) will move this Court at the Courthouse located at 2330 United States Courthouse, 100 State Street, Rochester, New York 14614 a date and time to be determined by the Court for an order pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) dismissing Plaintiff ERIC LAPRAIRIE, on behalf of himself and all other employees similarly situated (collectively “Plaintiff”)’s Complaint in its entirety, with prejudice, or, in the alternative, pursuant to 28 U.S.C. 1404(a), transferring the venue of this matter to the Southern District of New York, together with such other and further relief as this Honorable Court deems just, proper and equitable.

PLEASE TAKE FURTHER NOTICE, that, pursuant to Local Rule 7(a)(1), Defendants intend to file and serve reply papers in further support of this motion.

PLEASE TAKE FURTHER NOTICE, that, pursuant to Local Rule 7(c), Defendants request oral argument on this motion to the extent it is beneficial for the Court.

Dated: New York, New York
October 6, 2021

Respectfully Submitted,

GORDON REES SCULLY
MANSUKHANI, LLP

/s/ Joseph Salvo

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed with the Clerk of the Court using the CM/ECF system, which caused a copy to be served upon all counsel of record as follows:

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Dated: New York, New York
October 6, 2021

/s/ Joseph Salvo
Joseph Salvo, Esq.